



Tyler Haslam <tyler@haslamlawfirm.com>

Re: Hudson v. Racer, et al.

1 message

Kerry Nessel <nessel@comcast.net>

Thu, Sep 12, 2024 at 12:41 PM

To: "Stebbins, James C." <jstebbins@flahertylegal.com>

Cc: "Wendy E. Greve" <>wgreve@pffvw.com>, Jayne Hudnall <jhudnall@pffvw.com>, tyler@haslamlawfirm.com, "Burdette, Danica N." <dburdette@flahertylegal.com>

Thanks for thorough response.

Sent from my iPhone

On Sep 12, 2024, at 12:10 PM, Stebbins, James C. <jstebbins@flahertylegal.com> wrote:

Hi Kerry:

I need to look at some things regarding this request and am under a deadline in another matter today and I also want to try to reach out to my client about it. I will give you a full response tomorrow even if I am unable to reach him. I did not want you to think I was ignoring this request since you asked for an answer ASAP.

Best,

Jamie

James C. Stebbins

Member

Flaherty

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From: KERRY NESSEL <nessel@comcast.net>
Sent: Wednesday, September 11, 2024 2:17 PM
To: Stebbins, James C. <jstebbins@flahertylegal.com>; Wendy E. Greve <wgreve@pffwv.com>; Jayne Hudnall <jhudnall@pffwv.com>
Cc: tyler@haslamlawfirm.com
Subject: Hudson v. Racer, et al.

CAUTION: THIS EMAIL ORIGINATED FROM OUTSIDE THE ORGANIZATION.

Counsel, particularly Jamie, Tyler and I feel the need to redepose Racer due to the 700 + page internal affairs investigation, specifically Lt. Pile's interview with Racer and her conclusions.

As the Court entered an order yesterday extending the deposition deadline to Sept 27 and the recent disclosure, we believe our request is reasonable.

Please let me know ASAP.

Additionally, considering Racer had been brutally battered by no less than 5 men at a bar and suffered significant physical injuries, including a brain bleed and broken orbital bone on his left side, we request his medical records concerning the same.

Further, we are willing to travel to the WVSP academy to conduct this deposition.

Finally, please provide us dates for your availability to depose Lt. Pile. I assume this will have to take place in Chas.

Thanks.

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